## EXHIBIT 38

## LETTER OF INVITATION FROM A CITIZEN OF PANAMA

DATE: 09/21/2012

I (we) are inviting your Account Executive Avi Mirman call us so that we may open an account with your firm.

I (we) understand that applicable securities regulations in Panama require that (with certain limited exceptions) you receive your express invitation to call prior to contacting us to discuss investment matters.

I (we) understand that I (we) will not be entitled to all (or most) of the protections provided by Panama's National Securities Commission, and there will be no compensation available to us under the Panama's Investors Compensation Scheme. Therefore I acknowledge that I am not afforded any of the protections under the Regulatory system in Panama; however I choose to open and maintain an account in the United States with John Thomas Financial.

I (we) are entitled to the investors protection accorded by the Financial Industry National Regulatory Authority (FINRA), the Securities Investors Protection Corporation and the U.S. Securities and Exchange Commission.

I (we) expressly invite your Account Executive to call us between the hours of 8:00am and 9:00pm (local time) and I anticipate receiving such calls.

Very truly yours,

0

September 21, 2012

Date

Evelyn Quintero